

IN THE DISTRICT COURT OF CHOCTAW COUNTY

STATE OF OKLAHOMA

CLINT BEASON,

Plaintiffs,

vs.

STATE FARM FIRE AND
CASUALTY COMPANY,

Defendant.

CJ- 15-59

FILED
IN DISTRICT COURT
CHOCTAW COUNTY OK

DEC 14 2015

Laura Sumner, Court Clerk

By _____
Deputy

PETITION

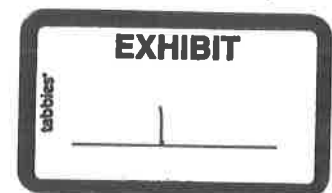
COMES NOW the Plaintiff, CLINT BEASON, and for his claims for relief against the above named defendant, alleges and states as follows.

1. The plaintiff, CLINT BEASON is a resident of McCurtain County and owns real property located in Choctaw County, State of Oklahoma.

2. Defendant, STATE FARM FIRE AND CSUALTY COMPANY, (hereinafter "STATE FARM") is a corporation authorized to provide insurance in the State of Oklahoma. Service of process can be obtained on defendant STATE FARM by serving Oklahoma Insurance Commissioner, 3625 N.W. 56th Street, Suite 100, Oklahoma City, OK 73112.

JURISDICTION AND VENUE

3. Jurisdiction is proper in the State of Oklahoma because defendant STATE FARM, is a corporation licensed to provide insurance in the State of Oklahoma.



4. Venue is proper in The District Court of Choctaw County in that the property insured by STATE FARM was located in Choctaw County, State of Oklahoma.

FACTS

5. On or about December 29, 2013, property owned by the Plaintiff and insured by the Defendant was vandalized.

6. Plaintiff reported the loss to defendant. Plaintiff fully cooperated with the terms of the policy and requested payment pursuant to the terms of the policy.

7 Defendant has denied plaintiff's insurance claim and refused to pay according to the terms of the policy and is in breach of contract.

8. Defendant has failed to deal fairly and in good faith with plaintiff. Defendant has committed bad faith and is guilty of oppression, willful and wanton conduct and malice.

WHEREFORE, plaintiff prays for judgment against STATE FARM for actual damages in an amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code, mental suffering and distress, together with interest, costs of this action and such other relief as this Court shall deem just and proper.

FURTHER, pursuant to 23 O.S. §9.1(B) and because the acts and omissions of STATE FARM represent a total disregard for the rights of the

plaintiff, Plaintiff prays for and is entitled to judgment against the defendant for exemplary damages.

ATTORNEYS LIEN CLAIMED

JURY TRIAL DEMANDED

LAW OFFICES OF MICHAEL D. LEWIS

A handwritten signature in black ink, appearing to read "Michael D. Lewis", with a long, sweeping horizontal line extending to the right.

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